

SAVORY MOBILE HOME PARK (PWSNO 1280166) SOURCE WATER ASSESSMENT REPORT

September 19, 2001



State of Idaho Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. This risk assessment is based on a land use inventory in the well recharge zone, sensitivity factors associated with how the well was constructed, and aquifer characteristics.

This report, *Source Water Assessment for Savory Mobile Home Park*, describes the public drinking water well; the well recharge zone and potential contaminant sites located inside the recharge zone boundaries. This assessment, taken into account with local knowledge and concerns, should be used as a planning tool to develop and implement appropriate protection measures for this public water system. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

A well field comprised to two 230-foot deep wells pumping from the Rathdrum Prairie Aquifer supplies drinking water for Savory Mobile Home Park. The water system serves a population of about 100 people in a residential neighborhood between Coeur d'Alene and Post Falls, Idaho. Historically, Savory Mobile Home Park has had few water quality problems. The system is in compliance with *Idaho Rules for Public Drinking Water Systems*. A ground water Susceptibility Analysis conducted by the Idaho Department of Environmental Quality August 1, 2001 found the well field to be moderately susceptible to all classes of regulated contaminants. Many factors used to assess vulnerability to contamination are unknown because the Savory Mobile Home Park well logs are not on file with DEQ. Nevertheless, the final susceptibility score for the well field is in line with scores for other wells pumping from the Rathdrum Prairie Aquifer.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

Because 186 public water systems in Idaho draw water from the Rathdrum Prairie Aquifer, they should consider forming a regional group to represent their interests before state, county and municipal governing bodies when regulatory tools like zoning overlays, or enactment of building codes are the most appropriate ground water protection measures.

In its own service area Savory Mobile Home Park should develop a well protection plan than includes maintenance of the pump house and sanitary setback zone as an area free from the use or storage of chemicals such as herbicides and fertilizers; solvents, paint and petroleum products. Deficiencies in distribution system components noted in sanitary surveys since 1984 should be corrected when the components need to be replaced in order to protect the system from surface contaminants.

Due to the time involved with the movement of ground water, source water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. For assistance in developing protection strategies, please contact your regional Department of Environmental Quality office or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR SAVORY MOBILE HOME PARK

Section 1. Introduction - Basis for Assessment

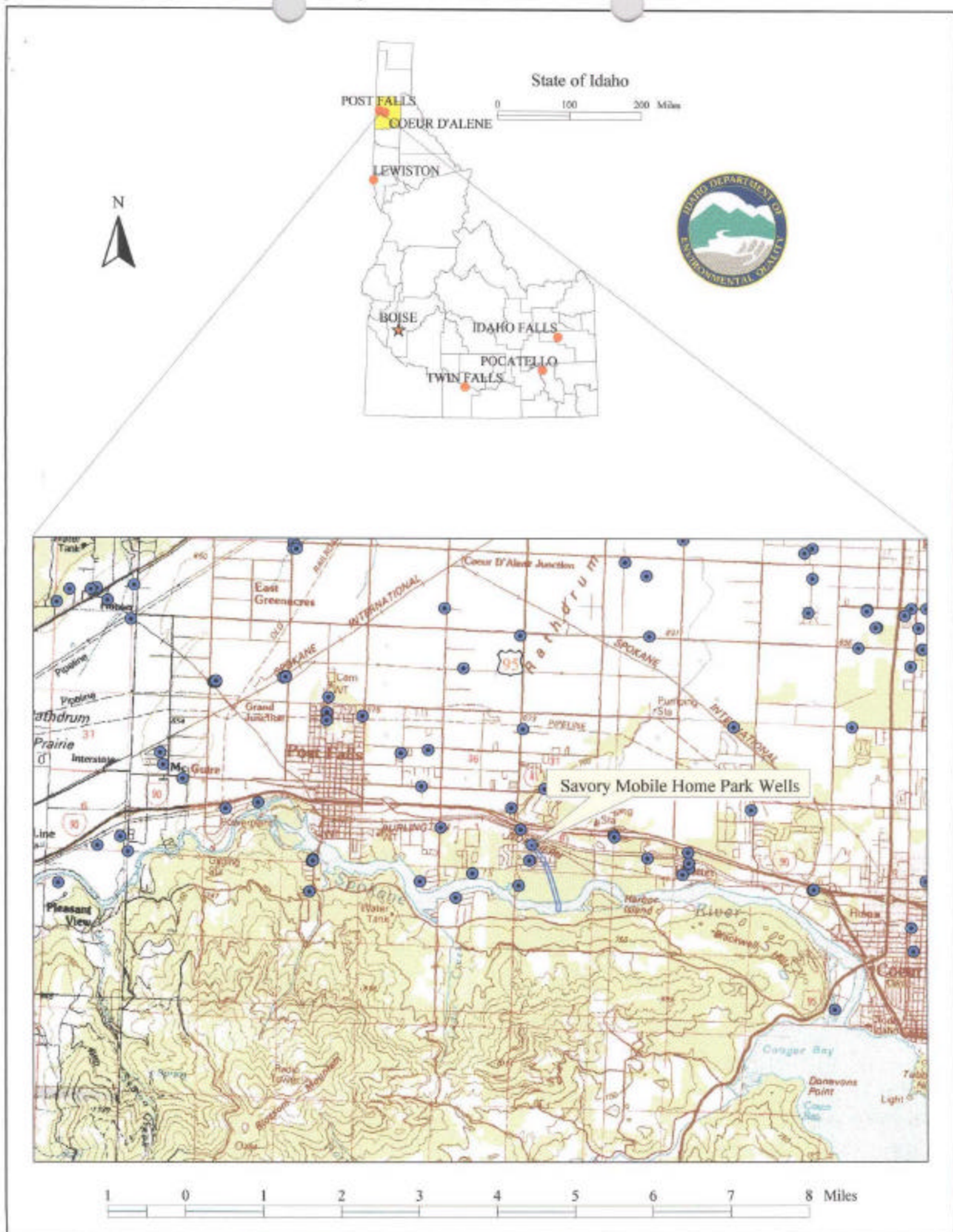
The following sections contain information necessary for understanding how and why this assessment was conducted. **It is important to review this information to understand what the ranking of this source means.** A map showing the delineated source water assessment area and an inventory of significant potential sources of contamination identified within that area are included. The ground water susceptibility analysis worksheets used to develop this assessment are attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess every public drinking water source in Idaho for its relative susceptibility to contaminants regulated by the Safe Drinking Water Act. These assessments are based on a land use inventory inside the delineated recharge zones, sensitivity factors associated with how the well is constructed, and aquifer characteristics. The state must complete more than 2900 assessments by May of 2003. Because resources and the time available to accomplish assessments are limited, an in-depth, site-specific investigation for every public water system is not possible.

The results of the source water assessment should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system The ultimate goal of this assessment is to provide data to local communities for developing a protection strategy for their drinking water supply. The Idaho Department of Environmental Quality recognizes that pollution prevention activities generally require less time and money to implement than treating a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a source water protection program should be determined by the local community based on its own needs and limitations. Wellhead or source water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Figure 1. Geographic Location of Savory Mobile Home Park



Section 2. Preparing for the Assessment

Defining the Zones of Contribution - Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the well recharge area into time of travel zones indicating the number of years necessary for a particle of water flowing through the aquifer to reach a well). DEQ used a refined computer model approved by the EPA to determine the time of travel (TOT) for water pumped from the Rathdrum Prairie Aquifer. The computer model used data assimilated by DEQ from a variety of sources including local well logs and pump volume estimates

Savory Mobile Home Park is a community water system with 40 connections serving a population of about 100 people in a residential area north of the Spokane River between Post Falls and Coeur d'Alene (Figure 1). A well field comprised of two 230-foot wells supplies drinking water for Savory Mobile Home Park customers. The estimated capacity of the wells is 45 GPM each.

The source water assessment delineation for the Savory Mobile Home Park wells encompasses 28.3 acres. The recharge zone curves about 0.75 miles to the south east from the wells to the edge of the Rathdrum Prairie Aquifer defined by the Spokane River. The estimated time of travel for water supplying the well is less than three years (Figure 2).

Identifying Potential Sources of Contamination

The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination.

Inventories for all public water systems in Idaho were conducted in two-phases. The first phase involved identifying and documenting potential contaminant sources within a system's source water assessment area through the use of computer databases and Geographic Information System maps developed by DEQ. A map showing the delineations and a table summarizing the results of the database search were then sent to system operators for review and correction during the second or enhanced phase of the inventory process. Information from the public water system file was also incorporated into the potential contaminant inventory.

Figure 2, *Savory Mobile Home Park Delineation and Potential Contaminant Inventory* on page 7 of this report shows the location of the Savory Mobile Home Park wellfield, the zone of contribution DEQ delineated for it, and potential contaminant sites in the vicinity. Land use inside the delineation boundaries is primarily residential. Individual septic systems serve homes in the area.

Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. When a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation.

Section 3. Susceptibility Analysis

The susceptibility to contamination of all ground water sources in Idaho is being assessed on the following factors:

- physical integrity of the well,
- hydrologic characteristics,
- land use characteristics, and potentially significant contaminant sources
- historic water quality

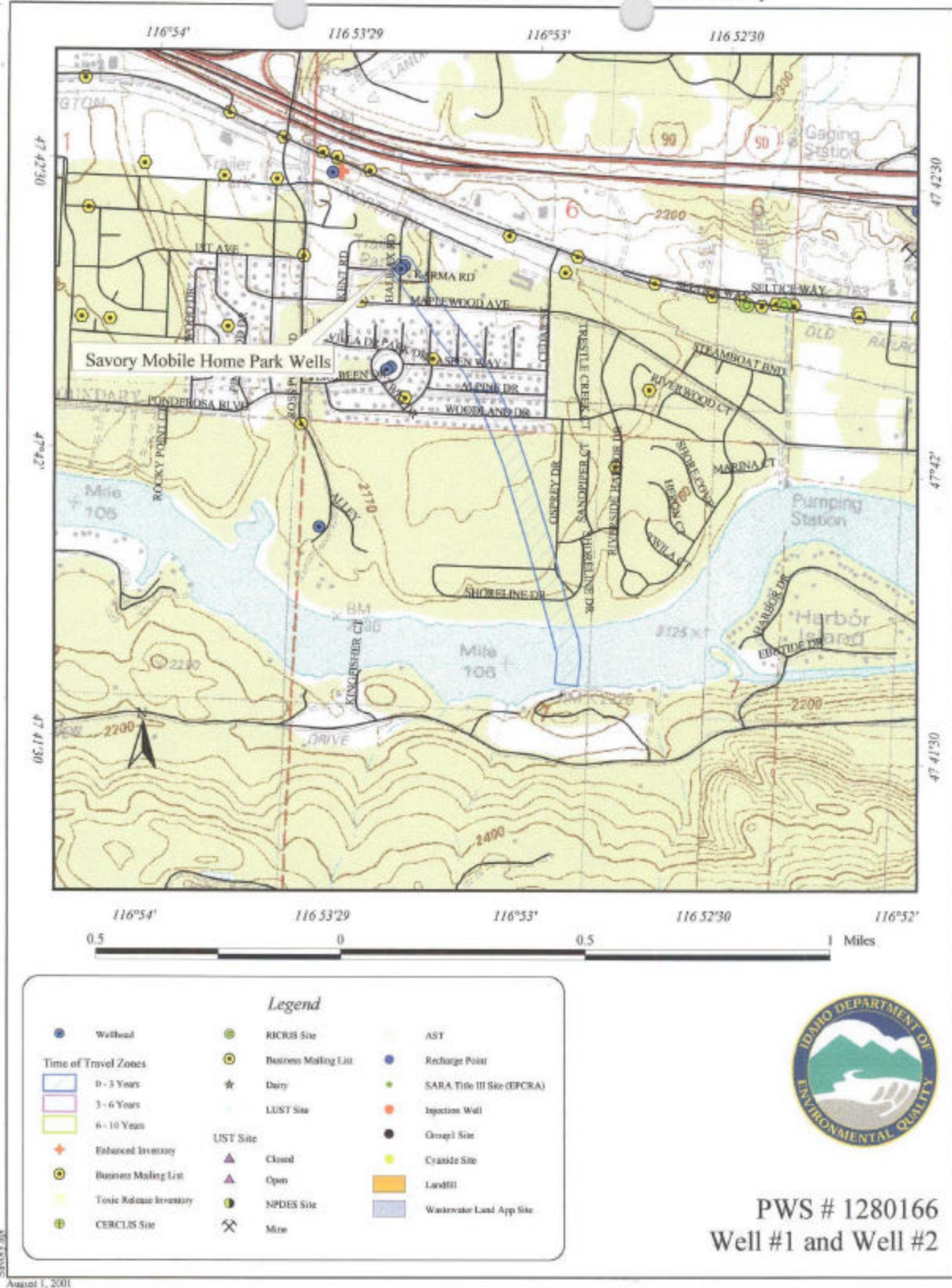
The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. A high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking. The susceptibility analysis Worksheet for Savory Mobile Home Park, Attachment A, shows in detail how the well was scored.

Well Construction

Well construction directly affects the ability of the wells to protect the aquifer from contaminants. Lower scores imply a well that can better protect the water. This portion of the susceptibility analysis relies on information from individual well logs and from the most recent sanitary survey of the public water system. The Savory Mobile Home Park well logs are not on file with DEQ. The Sanitary Survey conducted July 10, 2000 found the Savory Mobile Home Park system to be in compliance with *Idaho rules for Public Drinking Water Systems*. The survey reports that the reservoirs need access hatches to facilitate cleaning; a pneumatic tank currently buried should be above ground for periodic inspection; and finally that the pumping station is located in a pit. The improvements are to be completed when replacement of the existing components becomes necessary. No deficiencies in the wellheads and surface seals were noted.

Because the Savory Mobile Home Park well logs are missing there is no way to determine whether the wells meet current Idaho Department of Water Resources standards for casings and surface seals. The well logs also include lithologic data used to assess soil permeability at the well sites. A water supply survey in the public water system file for Savory Mobile Home Park, dated April 8, 1981, reports a well depth of 250 feet with the depth to ground water at 220 feet.

Figure 2. Savory Mobile Home Park Delineation and Potential Contaminant Inventory.



Hydrologic Sensitivity

Hydrologic sensitivity scores reflect natural geologic conditions at the well site and in the recharge zone. Information for this part of the analysis is derived from individual well logs and from the soil drainage classification inside the delineation boundaries. The Savory Mobile Home Park well scored 6 points out of 6 points possible in the hydrologic sensitivity portion of the susceptibility analysis.

Soils in the recharge zone generally are classed as moderately well to well drained. Soils that drain rapidly are deemed less protective of ground water than slow draining soils. The composition of the vadose zone, and the presence or absence of an aquitard at the well sites are unknown because the Savory Mobile Home Park well logs are not available. The scores however are typical of other wells on the Rathdrum Prairie where the soil zones above the water table are known to be gravel and cobbles without a significant clay layer to retard the vertical transport of contaminants.

Potential Contaminant Sources and Land Use

Figure 2, *Savory Mobile Home Park Delineation and Potential Contaminant Inventory* on page 7 shows the location of the Savory Mobile Home Park system well field and the delineated well recharge zone. Land use inside the delineation boundaries is urban residential, with homes on individual septic systems. There are no significant potential contaminant sources documented inside the Savory Mobile Home Park well field recharge zone.

Roads and streets crossing the delineation boundaries were discounted in the susceptibility analysis because they carry only low volume local traffic. Based on a 1995 site inspection and review of water test results, surface waters of the Spokane River appear not to influence the well.

Historic Water Quality

Historically, Savory Mobile Home Park has had few water quality problems. Since 1993 only four distribution system samples have been positive for total coliform bacteria. Bacterial tests are conducted monthly. Savory Mobile Home Park has been granted waivers to reduce the amount of testing required for synthetic organic compounds and volatile organic compounds which have never been detected in the well. Radiological contaminants in concentrations below the Maximum Contaminant Level (MCL) were present in samples tested in 1981, 1982, 1985 and 2000.

Nitrate concentrations have ranged from undetectable levels to 0.39 mg/l. The MCL for nitrate is 10 mg/l. Sodium, an unregulated contaminant, has been present in concentrations between 1.6 and 6.4 mg/l.

Final Susceptibility Ranking

The Savory Mobile Home Park well field ranked moderately susceptible to all classes of regulated contaminants. Many factors used to assess vulnerability to contamination are unknown because the well logs are not available. Nevertheless, the hydrologic sensitivity and system construction scores counted against the well are in line with scores for other systems pumping from the Rathdrum Prairie Aquifer. Totals for system construction and hydrologic sensitivity along with the cumulative scores for land use and potential contaminant sites in the well recharge zone are shown on Table 1.

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.35)

The final ranking categories are as follows:

- 0 - 5 Low Susceptibility
- 6 - 12 Moderate Susceptibility
- > 13 High Susceptibility

The complete susceptibility analysis worksheet for the Savory Mobile Home Park well can be found in Attachment A.

Table 1. Summary of Savory Mobile Home Park Susceptibility Evaluation

Cumulative Susceptibility Scores						
Well Name	System Construction	Hydrologic Sensitivity	Contaminant Inventory			
			IOC	VOC	SOC	Microbial
Well Field	4	6	2	2	2	2
Final Susceptibility Ranking						
	IOC	VOC	SOC	Microbial		
Well Field	Moderate	Moderate	Moderate	Moderate		

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

HIGH* - Indicates source automatically scored as high susceptibility due to presence of bacteria or a VOC, SOC or an IOC above the maximum contaminant level in the tested drinking water

Section 4. Options for Source Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. The State of Idaho and local health districts have instituted enhanced protection of the ground water in the Rathdrum Prairie Aquifer because of its high use and uniquely pristine water quality. The protections are generally aquifer wide and are not aimed at zones of contribution to a specific well or water system. *The Spokane Valley-Rathdrum Prairie Atlas*, sent to water systems on the prairie when they were invited to perform an enhanced contaminant inventory, describes some of the regional protection measures.

The 186 public water systems in Idaho that draw water from the Rathdrum Prairie Aquifer should consider forming a regional group to represent their interests before state, county and municipal governing bodies when regulatory tools like zoning overlays, or enactment of building codes are the most appropriate ground water protection measures. These types of measures could be used to protect the capture zones of a specific system or group of wells that could be put at risk from local land use changes.

In its own service area Savory Mobile Home Park should develop a well protection plan than includes maintenance of the pump house and sanitary setback zone as an area free from the use or storage of chemicals such as herbicides and fertilizers; solvents, paint and petroleum products. Deficiencies in distribution system components noted in sanitary surveys since 1984 should be corrected when the components need to be replaced in order to protect the system from surface contaminants.

Due to the time involved with the movement of ground water, wellhead protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term.

Assistance

Public water suppliers and users may call the following IDEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the IDEQ office for preliminary review and comments.

Coeur d'Alene Regional DEQ Office (208) 769-1422

State IDEQ Office (208) 373-0502

Website: <http://www.deq.state.id.us/>

Water suppliers serving fewer than 10,000 persons may contact Melinda Harper, Idaho Rural Water Association, at (208) 343-7001 for assistance with drinking water (formerly wellhead protection) strategies.

References Cited

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. "Recommended Standards for Water Works."

Idaho Department of Agriculture, 1998. Unpublished Data.

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Idaho Department of Environmental Quality, 2000. City of Fruitland Wellhead Viability Project 319 Grant Final Report July 2000.

Idaho Department of Water Resources, 1993. Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules. IDAPA 37.03.09.

Natural Resource Conservation Service, 1991. Idaho Snake-Payette Rivers Hydrologic Unit Plan of Work. March 1991.

United States Geological Survey, 1986. Quality of Ground Water in the Payette River Basin, Idaho. United States Geological Survey. Water Resources Investigation Report 86-4013.

University of Idaho. 1986. Ground Water Resources in a Portion of Payette County, Idaho. Idaho Water Resources Research Institute. University of Idaho. Moscow, Idaho. April 1986.

Attachment A

Savory Mobile Home Park Susceptibility Analysis Worksheet

Ground Water Susceptibility

Public Water System Name : **SAVORY MOBILE HOME PARK**

Source: **WELL FIELD**

Public Water System Number : **1280166**

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1. System Construction		SCORE			
Drill Date	1972, 1981				
Driller Log Available	NO				
Sanitary Survey (if yes, indicate date of last survey)	YES 2000				
Well meets IDWR construction standards	UNKNOWN	1			
Wellhead and surface seal maintained	YES	0			
Casing and annular seal extend to low permeability unit	UNKNOWN	2			
Highest production 100 feet below static water level	UNKNOWN	1			
Well located outside the 100 year flood plain	YES	0			
Total System Construction Score		4			
2. Hydrologic Sensitivity					
Soils are poorly to moderately drained	NO	2			
Vadose zone composed of gravel, fractured rock or unknown	UNKNOWN	1			
Depth to first water > 300 feet	NO	1			
Aquitard present with > 50 feet cumulative thickness	UNKNOWN	2			
Total Hydrologic Score		6			
		IOC	VOC	SOC	Microbial
3. Potential Contaminant / Land Use - ZONE 1A (Sanitary Setback)		Score	Score	Score	Score
Land Use Zone 1A	URBAN/RESIDENTIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2
Potential Contaminant / Land Use - ZONE 1B (3 YR. TOT)					
Contaminant sources present (Number of Sources)	NO	0	0	0	0
(Score = # Sources X 2) 8 Points Maximum		0	0	0	0
Sources of Class II or III leacheable contaminants or Microbials	NO	0	0	0	
4 Points Maximum		0	0	0	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		0	0	0	0
Potential Contaminant / Land Use - ZONE II (6 YR. TOT)					
Contaminant Sources Present	NA	0	0	0	
Sources of Class II or III leacheable contaminants or Microbials	NA	0	0	0	
Land Use Zone II		0	0	0	
Potential Contaminant Source / Land Use Score - Zone II		0	0	0	0
Potential Contaminant / Land Use - ZONE III (10 YR. TOT)					
Contaminant Source Present	NA	0	0	0	
Sources of Class II or III leacheable contaminants or Microbials	NA	0	0	0	
Is there irrigated agricultural lands that occupy > 50% of Zone	NA	0	0	0	
Total Potential Contaminant Source / Land Use Score - Zone III		0	0	0	0
Cumulative Potential Contaminant / Land Use Score		2	2	2	2
4. Final Susceptibility Source Score		10	10	10	11
5. Final Well Ranking		Moderate	Moderate	Moderate	Moderate

POTENTIAL CONTAMINANT INVENTORY

LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as Superfund is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.